

JAP:TJS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M - 1 1 - 966

- - - - -X

UNITED STATES OF AMERICA

- against -

TALECHA BARTHELMY,

Defendant.

PRE-ARRAIGNMENT

C O M P L A I N T

(21 U.S.C. §§ 952(a)
and 960)

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

JOHN MOLONEY, being duly sworn, deposes and states that he is a Special Agent with Department of Homeland Security, Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

Upon information and belief, on or about September 26, 2011, within the Eastern District of New York and elsewhere, defendant TALECHA BARTHELMY did knowingly, intentionally and unlawfully import into the United States from a place outside thereof cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:^{1/}

^{1/} Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

1. On September 26, 2011, defendant TALECHA BARTHELMY arrived at John F. Kennedy International Airport in Queens, New York, aboard Jet Blue Airlines Flight No. 880 from St. Lucia.

2. BARTHELMY was selected for an enforcement examination. During the examination, a Customs and Border Protection ("CBP") Inspector noticed that defendant BARTHELMY gave inconsistent answers to questions and appeared unusually nervous. BARTHELMY was escorted to a private search room. A pat down was conducted with negative results. BARTHELMY still appeared nervous and, during additional questioning, admitted, in sum and substance, to ingesting foreign bodies.

3. BARTHELMY was then presented with an x-ray consent form, which she read, appeared to understand and signed. BARTHELMY was transported to the medical facility at John F. Kennedy International Airport. Upon arrival at the medical facility, she indicated that she had to use the restroom. She then passed one pellet, which field-tested positive for the presence of cocaine. Approximately 20 minutes later, BARTHELMY regurgitated 8 pellets. An x-ray was subsequently taken of her intestinal tract, which was positive for foreign bodies.

4. Defendant BARTHELMY will be detained at the JFK medical facility until such time as she has passed all the pellets contained within her intestinal tract.

WHEREFORE, your deponent respectfully requests that defendant TALECHA BARTHELMY be dealt with according to law.

John M. Moloney
JOHN MOLONEY
Special Agent
Homeland Security
Investigations

Sworn to before me this
27th day of September, 2011